EXHIBIT S

EXHIBIT 53

EXHIBIT FILED UNDER SEAL

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC. PASSENGER SEXUAL ASSAULT LITIGATION

Case no. 3:24-cv-07019-CRB

Case no. 3:24-cv-07821

Case no. 3:24-cv-7940 Case no. 3:23-cv-06708

Case no. 3:24-cv-04900

----X

*** HIGHLY CONFIDENTIAL ***

VOLUME II

VIDEOTAPED DEPOSITION

OF

SUNNY WONG

TUESDAY, OCTOBER 14, 2025

Reported by: CANDIDA BORRIELLO Stenographic Reporter JOB NO. 6989788-001

```
1
            S. Wong - Highly Confidential
 2
          Ο.
               Yes.
 3
               Is the S-RAD score is specifically
 4
     a score of the risk of sexual assault or
 5
     sexual misconduct for that pairing, right?
 6
               MR. PREMO-HOPKINS:
                                    Object to
 7
          form.
               Well, the model itself, S-RAD, is
 8
          Α.
 9
     trained up on that data, reports of sexual
10
     assault, sexual misconduct. So the score
11
     itself is again an assessment from the model.
               It's an assessment or a score of
12
          Q.
13
     the risk of sexual assault or sexual
     misconduct, right?
14
15
          Α.
               Correct.
16
          Ο.
               Did you say "correct"?
17
          Α.
               Yes.
18
               And that risk, the risk of sexual
          Q.
19
     assault or sexual misconduct for a given
20
     pairing is a risk that matters to Uber,
21
     right?
2.2
               MR. PREMO-HOPKINS: Object to
23
          form.
                 Scope.
24
          Α.
               What do you mean by -- you're gonna
     have to expand on what do you mean by
25
```

```
1
            S. Wong - Highly Confidential
 2
          you're gonna instruct him not to
          answer, we will go off the record and
 3
 4
          get the court involved.
 5
               MR. PREMO-HOPKINS: Ask your
          question again.
 6
     BY MS. PETERS:
 7
               Does it matter to Uber whether
 8
          0.
 9
     women are sexually assaulted on trips paired
     by Uber?
10
11
               MR. PREMO-HOPKINS: Object to
12
          form.
                 Scope.
13
               You can answer to the extent you
14
          understand the question.
15
               Again, as I mentioned earlier, I
          Α.
16
     mean, we get the S-RAD scores first to
17
     understand whether or not we need to flag the
18
     trip and potentially intervene using the
     S-RAD intervention, right, that's part of the
19
20
     S-RAD safety control that we have.
21
          Ο.
               The S-RAD score is a score that's
22
     calculated by Uber's -- by a machine-learning
23
     program that Uber uses, right?
24
          Α.
               Correct.
25
               That's a program that Uber's data
          Q.
```

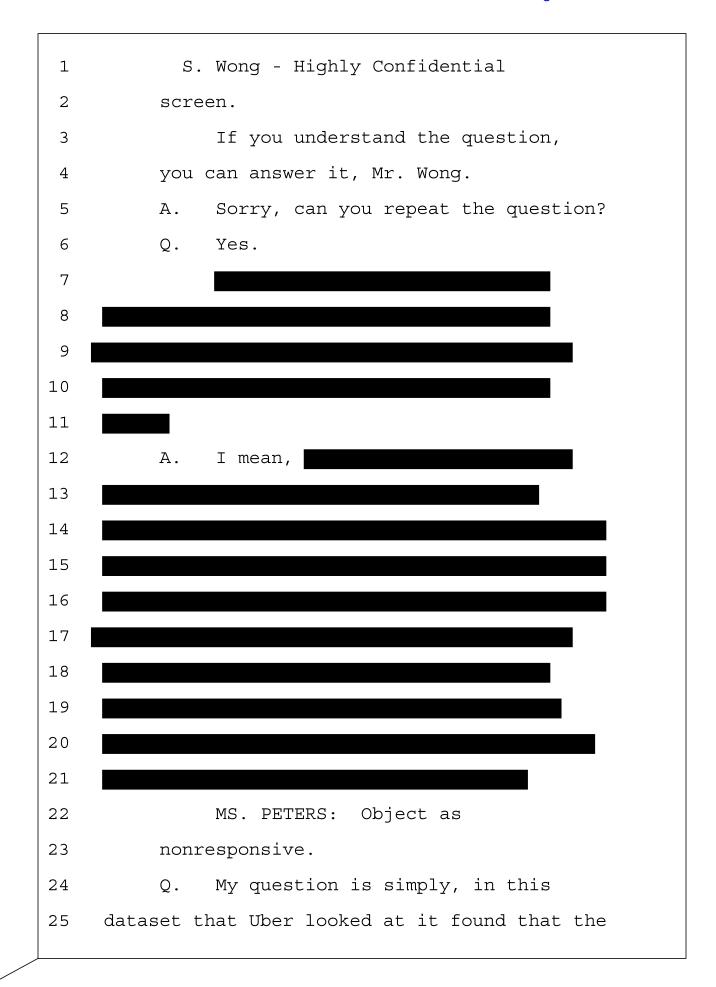
```
S. Wong - Highly Confidential
 1
 2
          form.
                 Vaque.
               I wouldn't characterize it that
 3
          Α.
 4
     way.
 5
 6
 7
 8
 9
10
11
               MS. PETERS: Let's go, Dianne,
          please to Tab 56, a demonstrative
12
13
          scale.
               The S-RAD scale is
14
          0.
15
     right?
16
               MR. PREMO-HOPKINS: I'm gonna
          object on form and foundation with
17
          regard to this demonstrative.
18
19
               MS. PETERS: And you can have,
          Counsel, a standing objection to this
20
          demonstrative to avoid interruption.
21
               I'm gonna ask the question again.
2.2
          Ο.
23
               Mr. Wong, the S-RAD score scale is
24
     from
25
     right?
```

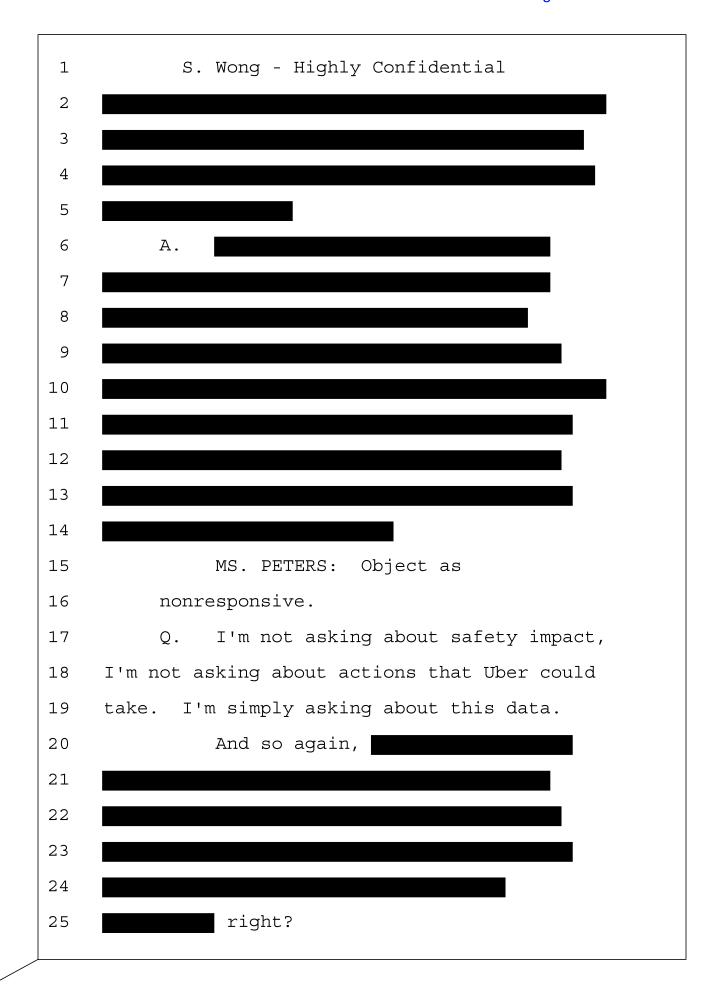
```
S. Wong - Highly Confidential
 1
               That's correct.
 2
               MR. PREMO-HOPKINS: And I'm sorry,
 3
 4
          Sara, just because I don't know if
 5
          this one has come through, is it just
          one page, just the one page that we're
 6
          looking at?
 7
               MS. PETERS: Yes, there's nothing
 8
          else.
 9
               THE COURT REPORTER: This is being
10
11
          marked as an exhibit, correct?
12
               MS. PETERS: It's not yet, we're
13
          going to keep developing it and then
14
          mark it, the demonstrative.
15
               THE COURT REPORTER: Thank you.
16
          Sorry.
17
               MS. PETERS: No, thank you.
18
          Q.
19
20
21
22
23
              right?
24
          A.
                                    That's correct,
25
     yeah.
```

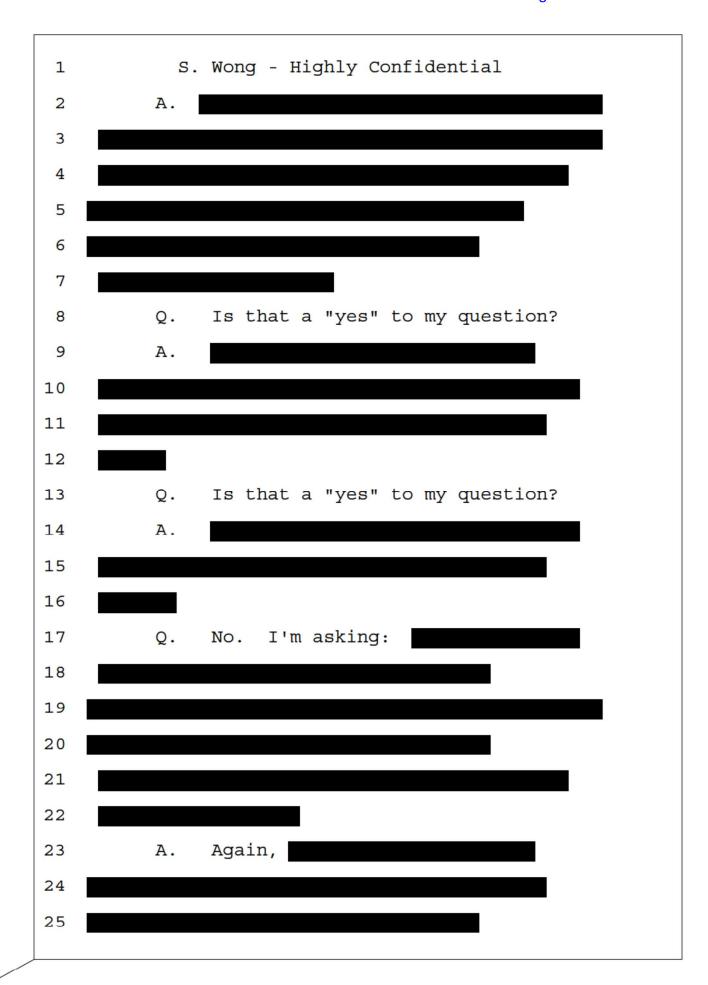
```
S. Wong - Highly Confidential
 1
 2
          Q.
 3
 4
     correct?
 5
          A.
               That's correct.
               MR. PREMO-HOPKINS: Objection.
 6
               That is -- strike that.
 7
          0.
 8
 9
10
                                  right?
11
               I'm just referring to my --
12
               THE COURT REPORTER: I'm sorry, I
13
          can't hear you. It's a little
14
          muffled.
               I was mentioning that I'm referring
15
          Α.
16
     to my deposition aid, just to look at the
17
     average score.
18
               Go ahead. Can you repeat that?
19
          Q.
20
21
22
          Α.
               That's correct. But it doesn't
23
     represent 50 percent which is on the chart
24
     average and 50 percent is different --
25
     50 percent is the median. So again, you're
```

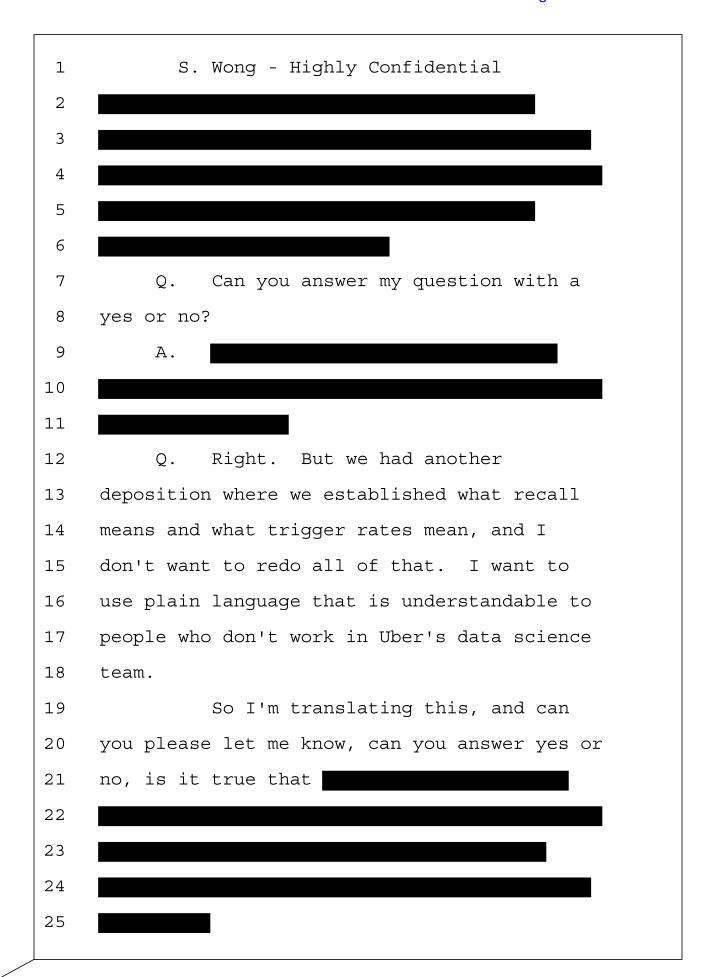
```
S. Wong - Highly Confidential
 1
 2
               MS. PETERS: We -- on a break,
          we'd like to find out what that
 3
 4
          trigger rate was, please.
 5
               MR. PREMO-HOPKINS: Okay. Your
          request has been noted.
 6
 7
               MS. PETERS: All right.
 8
          Q.
               So Ms. Dean's score,
 9
10
11
           right?
12
          Α.
               It's higher in the daytime in
13
     San Francisco, the threshold.
14
               No, I'm talking about something
          Q.
     else. So -- strike that.
15
16
               The score for Jaylynn's trip in
17
     November 2015 was higher than the risk score
18
     on average for Phoenix at nighttime that
     month, right?
19
20
          Α.
               Correct, it was higher than the
21
     average, correct.
22
          0.
               And it was higher than the cutoff
23
     that Uber set to reflect the top risk during
24
     San Francisco Bay Area daytime rides in
     August 2023, right?
25
```

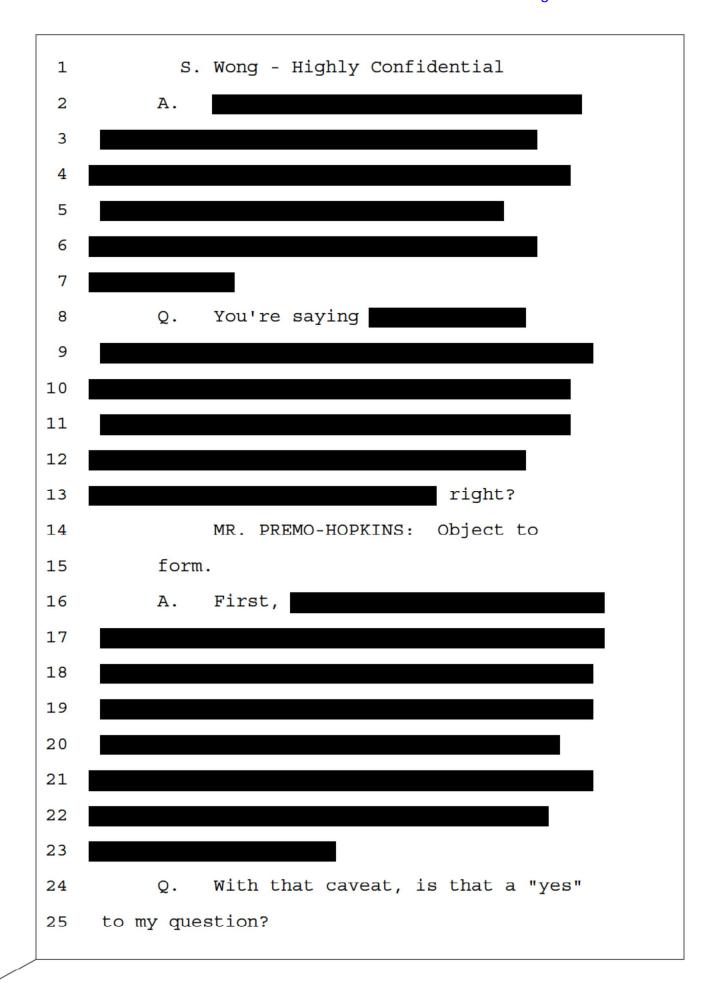
```
S. Wong - Highly Confidential
 1
               MR. PREMO-HOPKINS: Object to
 2
 3
          form.
 4
          A.
               Right.
 5
 6
 7
 8
 9
10
11
12
13
14
15
16
          Q.
               Move to strike everything after
17
     "right" as nonresponsive.
               And just direct you, Mr. Wong, we
18
19
     have limited time. Please just answer the
20
     question. I know you have points to make
     about why those numbers shouldn't be
21
22
     compared, but I'm comparing them, so...?
23
               MR. PREMO-HOPKINS:
                                    Ms. Peters, I
          ask you to comply with the court's
24
          order. You're not allowed to move to
25
```

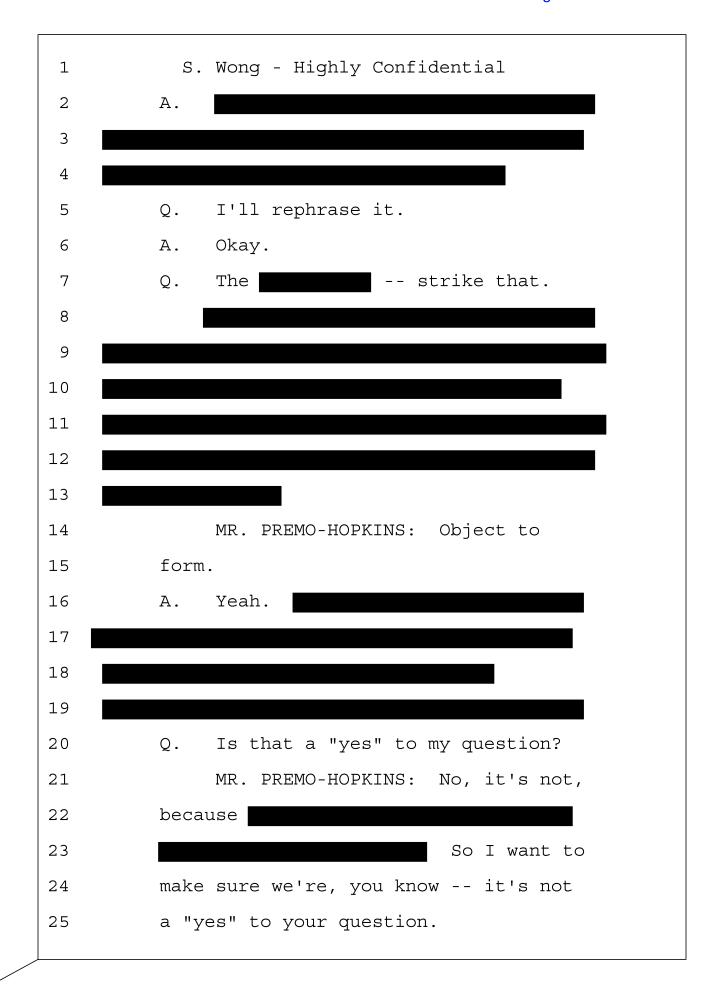


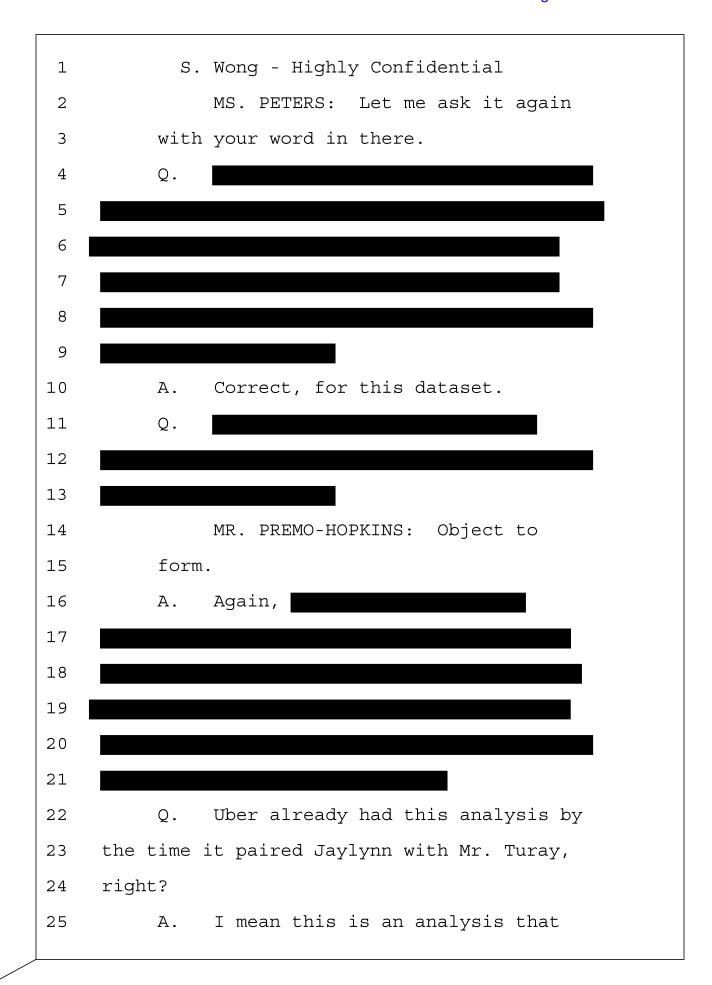




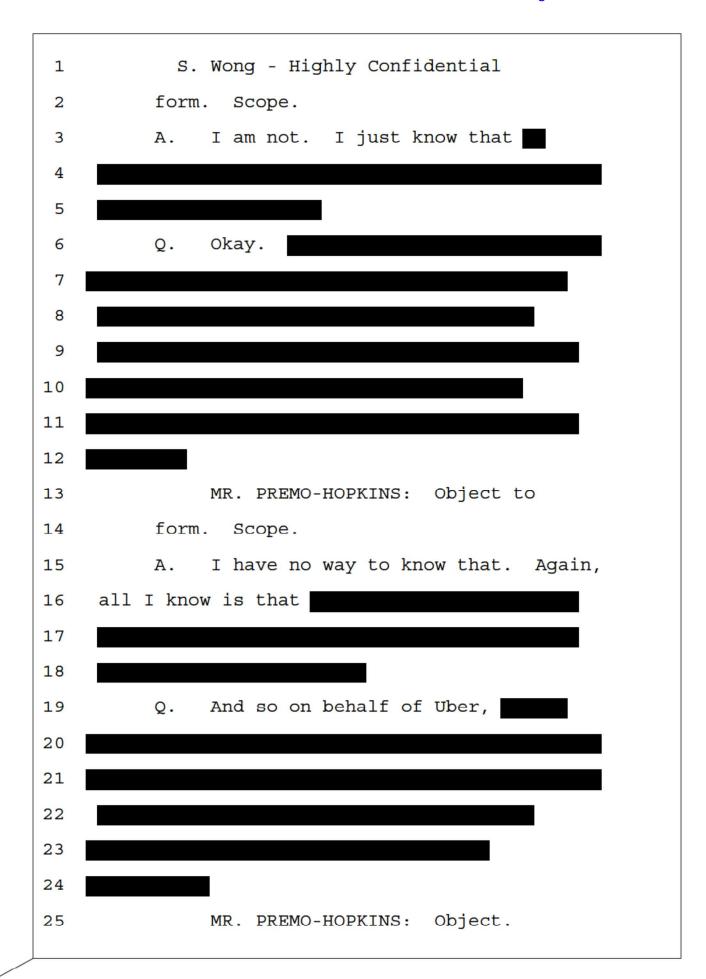








```
S. Wong - Highly Confidential
 1
 2
          unresponsive.
 3
               And direct you please to just
          Q.
 4
     answer the question.
 5
               MR. PREMO-HOPKINS: Ms. Peters,
          he's being incredibly responsive to
 6
 7
          your imprecise question. So if you
          want to ask a more precise question,
 8
          you might be able to get the answer
 9
10
          you're looking for, but he's
          responding directly to your questions.
11
12
          Q.
               Mr. Wong,
13
14
15
16
17
18
               MR. PREMO-HOPKINS: Object to
19
          form.
                 Scope.
               I do not know that, that's outside
20
          Α.
21
     my --
2.2
                (Court Reporter clarification.)
23
               -- not something I have readily
          Α.
24
     available.
25
          Q.
               And then shifting to Phoenix, are
```



```
S. Wong - Highly Confidential
 1
 2
          Scope.
 3
          Α.
               Again, I don't know that because
 4
 5
 6
          Q.
 7
                 right?
 8
 9
          Α.
               Correct.
10
               And there's or -- I'm sorry, was it
          Q.
11
12
          Α.
13
14
          Ο.
               That threshold is one that Uber
     picked, right?
15
16
               That was the one we configured for
          Α.
17
18
               Did you say Uber configured it?
19
          Q.
               That was the threshold we came up
20
          Α.
     with.
21
               And when you say "we," you're
22
          Q.
     talking about Uber, right?
23
24
          Α.
               Correct.
               Uber came up with that threshold of
25
          Q.
```

```
S. Wong - Highly Confidential
 1
 2
          right?
          Α.
 3
               Correct.
 4
          Q.
               And there's no regulation or
 5
     outside rule that says Uber has to accept
     pairings with scores
                                         when it
 6
 7
     makes
                             in Phoenix, right?
               MR. PREMO-HOPKINS:
                                   Object to
 8
 9
          form.
                 Scope.
               Not that I know of.
10
          Α.
11
          Q.
               Uber, if it wants to, can set its
12
     risk tolerance lower, right?
13
               MR. PREMO-HOPKINS: Same
14
          objection.
15
               Again, we've aligned on our trigger
          Α.
16
     rate at nationally and, you know, that's
17
     the, you know,
18
19
20
21
          Q.
               Mr. Wong, we know that Uber can set
22
     the trigger rate lower if it wants to because
23
     as we just discussed it did set the trigger
24
     rate or rather the threshold -- strike that.
25
     Start over.
```

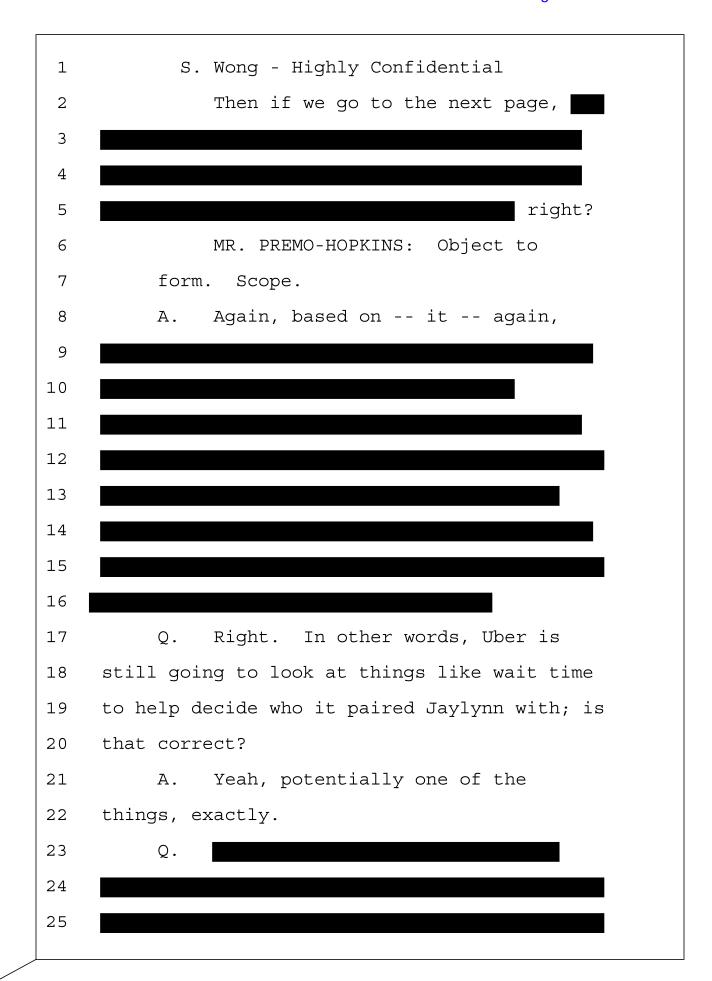
```
S. Wong - Highly Confidential
 1
 2
          Α.
               Hasn't made its way across yet.
 3
          Q.
               Actually, scroll up from there.
 4
          Α.
               Okay.
 5
          Q.
               So on page 2 it turns out --
          Α.
               Can you give me a second to look at
 6
 7
     this? I don't know if I've seen this
     recently.
 8
 9
          Ο.
               Sure.
             (Document review.)
10
          Α.
          Q. You ready?
11
          A. Give me one more minute.
12
                                          Sorry.
13
               (Document review.)
14
               Okay.
15
               So looking at page 2 of
          Q.
16
     Exhibit 2202 under the heading Initial
     Findings and then Item 2, Cities. This Uber
17
18
     document says:
19
               We looked at L12 week's IPC data to
     identify cities with highest incidences of
20
21
     sexual assaults.
               And then sub-point A says:
2.2
23
24
25
```

```
S. Wong - Highly Confidential
 1
 2
               Do you see that?
 3
               I see that.
          Α.
 4
          Q.
               And if we go to the next portion of
     that same page, those cities, the ones with
 5
 6
     the highest incidents of sexual assault, are
 7
     listed and
 8
 9
10
               Do you see that?
11
               I'm able to see that.
12
          Q.
               And again,
              the way that Uber grouped cities
13
     geographically, right?
14
15
          Α.
               That's true. From like a city ID
16
     perspective,
17
18
                                           so I
     just want to mention that.
19
               All right.
20
          Q.
               MS. PETERS: Let's go ahead and
21
22
          take that down, please.
23
          Q.
               Did --
24
25
```

```
S. Wong - Highly Confidential
 1
 2
               All right. If we go to the next
     page, please. This is just a hypothetical.
 3
 4
 5
 6
 7
               Do you see that?
          Α.
               I do see that.
 8
 9
               MR. PREMO-HOPKINS: Object to the
10
          questioning on the demonstrative. Can
11
          I have a standing objection on this
          one as well, Sara?
12
13
               MS. PETERS: Yes.
14
               And then the other S-RAD scores for
          Ο.
15
     other potential trips are hypothetical S-RAD
16
     scores that we made up.
17
18
19
20
               MR. PREMO-HOPKINS: Object to
21
          form.
                 Scope.
2.2
          Α.
               Yep, I see some hypothetical scores
23
     and mapped to hypothetical yellow cars on
24
     this, yes.
               Okay. So the -- this is just to
25
          Q.
```

```
S. Wong - Highly Confidential
 1
     demonstrate how S-RAD worked in November of
     2023 in the Phoenix area. And so if
 3
 4
     hypothetically this was the situation where
 5
     there were other trips available,
                                            than
 6
 7
     the Jaylynn Dean-Turay pairing.
 8
               Then if we go to the next page,
 9
10
11
12
               MR. PREMO-HOPKINS:
                                    Object to
13
          form.
                 Scope.
14
          Α.
               Yeah, I mean if it's above the
15
     threshold, yes, then it would not be
16
     considered.
17
               Right. And in that time in
18
          Q.
19
     November of 2023 in Phoenix, was Uber just
20
21
22
23
               THE COURT REPORTER:
                                     I'm sorry.
24
          You sounded like you broke up.
25
          Α.
               Sorry. I was asking for a minute
```

```
S. Wong - Highly Confidential
 1
     just so I can refer back to my dep aid, so I
 2
     can get some timelines.
 3
 4
          Q.
               Yep.
               According to my dep aid, as of
 5
          Α.
     November for that particular trip,
 6
 7
     November 15, 2023,
 8
 9
          0.
               And so --
10
          A. Yeah.
               -- under this hypothetical scenario
11
          Q.
12
     at that time,
13
14
15
                                  right?
16
          Α.
               Yes,
17
                                             that's
18
     correct.
               The supply plan again is a
19
          Q.
     potential driver-rider pairing, right?
20
21
          Α.
               Right.
22
          Q.
               So then
23
24
25
```



```
S. Wong - Highly Confidential
 1
 2
 3
 4
              right?
 5
          A.
               Is that correct?
 6
          Q.
 7
          Α.
 8
               Was there any other program Uber
 9
          0.
     used other than S-RAD to try to downrank or
10
11
     avoid pairing Jaylynn with Mr. Turay because
     of the risk of sexual assault or sexual
12
13
     misconduct?
14
          Α.
               Not that I know of.
               Are you aware of any other program
15
          0.
     that Uber uses when it makes a pairing of a
16
17
     rider with a driver other than S-RAD that
18
     tries to avoid trips that have a high risk
     for sexual assault or sexual misconduct?
19
               Not specifically outside of
20
          Α.
21
     pairings.
22
          0.
               I didn't understand that.
23
               So I'm just talking about pairings
     specifically. When Uber paired Jaylynn with
24
     Mr. Turay, was it using any other program
25
```

```
S. Wong - Highly Confidential
 1
 2
               Isn't it true Uber did nothing
     after it determined she was --
 3
 4
                              it did nothing
 5
     further to try to choose the safest of the
     trips
                              for her?
 6
 7
               MR. PREMO-HOPKINS: Object to
          form.
 8
 9
          Α.
               There was -- at that point
10
11
12
13
          Ο.
               What did Uber do after it
14
     determined that Jaylynn's trip was
15
                 What is it it did further to try
     to make sure it was picking the safest match
16
17
     possible for her?
18
               MR. PREMO-HOPKINS: Object to
19
          form.
20
               Again, I don't know what other
          Α.
21
     plans were available at that time period,
22
     right, to say whether or not that was -- if
23
     there were other scores that were lower.
               Right. But you don't need to know
24
          Ο.
     whether there are others available 'cause you
25
```

```
S. Wong - Highly Confidential
 1
 2
     know
 3
 4
 5
 6
 7
     right?
               Correct. And at that point then
 8
          Α.
 9
10
          Q. Right.
11
12
               MS. PETERS: We can take that
13
          down.
               To be clear, Jaylynn did not have
14
          0.
15
     any choice to select from available drivers,
16
     right?
17
               MR. PREMO-HOPKINS: Object to
          form. Scope.
18
               That's not part of the Uber trip
19
     requests -- process. We don't get to select
20
     individual drivers.
21
2.2
          O.
               No, I mean Uber does select
     individual drivers, but the rider, Jaylynn,
23
24
     did not, right?
               That's correct.
25
          Α.
```

```
S. Wong - Highly Confidential
 1
               Driver one-star rate total,
 2
     correct.
 3
               And Mr. Turay's one-star rate,
 4
          Q.
     meaning how many one-star ratings he received
 5
     as a fraction of all ratings he received, was
 6
 7
     1.07 percent, right?
 8
          A.
               Correct.
 9
          Q.
10
11
12
13
14
          A.
15
16
          Q.
               Directing you back to my question.
17
18
19
20
21
22
23
24
               MR. PREMO-HOPKINS: Object to form
          the.
25
```

```
S. Wong - Highly Confidential
 1
 2
               And I was mentioning that it's,
          Α.
 3
     again,
 4
 5
               Is that a "yes"?
 6
          0.
 7
          Α.
               Yes.
               The one-star rate of 1.07 percent
 8
          0.
     is more than double the median one star rate
 9
     for drivers in the Phoenix area, right?
10
11
               Based on the previous seven-day
          Α.
     calculation that the team did that determined
12
13
     that the median driver one-star rating was
14
     .45 percent. But even for this particular
     driver, that 1 percent is higher, but I would
15
     argue that that's still a very small rate.
16
               But please don't argue because this
17
18
     is our chance to ask questions and just get
     answers and there will be other times for you
19
20
     to give context and argument.
21
               So again, I just want to object as
22
     nonresponsive and direct you back to my
23
     question.
24
               Mr. Turay's one-star rate of
25
     1.07 percent was more than double the median
```